



**EB-06-TC-060**

**CERTIFICATION OF CPNI FILING FEBRUARY 2, 2006**

Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street S.W.  
Washington, D.C. 20554

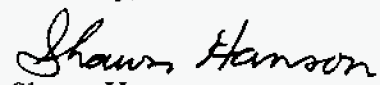
Filed via ECFS

Dear Secretary Dortch:

In accordance with the Public Notice issued by the Enforcement Bureau on January 30, 2006, please find attached our company's annual compliance certificate for the most recent period as required by section 64.2009(e) of the Commission's Rules together with a statement of our company's operating procedures established to ensure compliance with the Commission's Rules and Regulations regarding Customer Proprietary Network Information.

Should you have any questions regarding this filing, please direct them to the undersigned,

Sincerely,

  
Shawn Hanson  
General Manager

Enclosures

Cc: Bryon McCoy via e-mail [byron.mccoy@fcc.gov](mailto:byron.mccoy@fcc.gov)  
Best Copy and Printing via e-mail [fcc@bcpiweb.com](mailto:fcc@bcpiweb.com)



Project  
Telephone Company

TOTAL TELECOMMUNICATIONS

**CERTIFICATE OF COMPLIANCE: CUSTOMER PROPRIETARY NETWORK INFORMATION  
(CPNI)**

This certifies that the undersigned, as a corporate officer of Project Telephone Company, has personal knowledge that Project Telephone Company has established operating procedures that are adequate to ensure compliance with the CPNI rules as contained in Subpart U – Customer Proprietary Network Information – of Part 64 of Title 47 of the Code of Federal Regulations.

*Shawn Hanson*

Signature

GENERAL MANAGER

Title

JULY 19, 2005

Date



July 2005

### **STATEMENT OF EXPLANATION: CPNI COMPLIANCE**

This accompanying statement explains how Project Telephone Company's operating procedures ensure that we are in compliance with the rules governing CPNI as found in Subpart U – Customer Proprietary Network Information – Part 64 of Title 47 of the Code of Federal Regulations.

Project Telephone Company adheres to all CPNI rules as stated in Section 64.2001-64.2009 concerning the proper use of our customer's CPNI. Project Telephone Company does not use CPNI for marketing purposes. To further protect our customer's privacy, we have implemented all safeguards required in Section 64.2009. This includes:

- The training of appropriate personnel as to the confidentiality requirements of customer information including CPNI and specific instructions that CPNI will not be used for marketing purposes;
- The implementation of an express disciplinary process for confidentiality and CPNI violations;
- The implementation of a system by which CPNI information is not used for marketing purposes for Project Telephone Company or its affiliates;
- The establishment of a supervisory review process of all outbound marketing to ensure that CPNI is not used for outbound marketing; and
- The establishment of annual certification by a corporate officer, who has personal knowledge that Project Telephone Company has established procedures that are adequate to ensure compliance with the CPNI rules.

A copy of the subpart cited above is attached to this statement of explanation.